



Alphons Mulders

Expereo USA, Inc.

11800 Sunrise Valley Drive, Suite 125, Reston, VA 20191,

Reston, February 28th, 2012

Subject: CPNI Certification EB 06-36

Dear Sir/Madame,

On behalf of Expereo USA, INC., please find enclosed the company's annual CPNI certification for filing in the above-referenced docket. Please contact me at +1 571 449 8490 if you have any questions regarding this filing.

Respectfully submitted,

Alphons Mulders
CEO

Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket No. 06-36

Annual CPNI Certification for 2012 covering the calendar year 2011.

1. Date filed: March 1, 2012
2. Name of company(s) covered by this certification: Expereo USA, Inc.
3. Form 499 Filer ID: 828596
4. Name of signatory: Alphons Mulders
5. Title of signatory: Managing Director & CEO
6. Certification:

I, Alphons Mulders, certify that I am an officer of Expereo USA, Inc. (the "Company"), and acting as an agent of the company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in Sections 64.2001 *et seq.* of the Commission's rules.

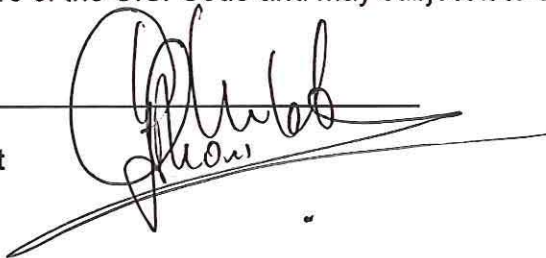
The Company did not take any actions (*i.e.*, proceedings instituted or petitions filed at state commissions, the court system, or at the Commission) against data brokers in 2011.

The Company did not receive customer complaints in 2011 concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed _____

Attachment

A handwritten signature in black ink, appearing to read "Alphons Mulders", is written over a horizontal line. The signature is stylized with a large initial "A" and a long, sweeping underline.

STATEMENT OF COMPLIANCE WITH CPNI RULES

Expereo USA, Inc. (the "Company") provides exclusively carrier-to-carrier data only telecommunications services (for the avoidance of doubt Expereo does not provide any voice services) and has no consumer or small business customers. Its customers are carriers and systems integrators and other enhanced service providers. Consequently, the Company does not have a "subscriber" relationship with its end-user customers and does not send "bills" to end-user customers. The Company does not offer or market its services to the public or to such classes of users as to be effectively available directly to the public. The Company provides service only to other carriers and enhanced services providers, and typically does not obtain information that relates to the quantity, technical configuration, type, or location of services other than those with which the services it provides are connected.

The Company has implemented processes and procedures as to when its employees are and are not permitted to use CPNI. All Company employees are required to abide by the Company's CPNI Manual. The Company's CPNI Manual requires employees to maintain the confidentiality of all information, including CPNI, obtained as result of their employment by the Company. The Company's CPNI Manual also explains how Company employees are required to use, maintain and disclose CPNI. Employees who violate the Company's CPNI Manual are subject to disciplinary action, including possible termination.

Consistent with the CPNI rules, the Company may use, disclose and permit access to CPNI without customer approval (1) to render, bill and collect for services provided (2) to protect rights or property of the Company, other users, or other carriers from unlawful use; and (3) for the purpose of network maintenance, repair and troubleshooting.

The Company does not use, disclose, or permit access to CPNI for marketing purposes other than for the purpose of providing service offerings for the type of services to which the Company's customer already subscribes, except pursuant to the written consent of its customers pursuant to 47 C.F.R. § 64.2010(g). The Company is therefore not required to seek other approval from existing customers to use their CPNI and does not maintain a separate record of a customer's approval to use CPNI. In the event the Company changes its marketing practices or expands its service offerings so that other customer approval is required, the Company will implement a system by which customers will be notified of such use and the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

The Company does not share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors or any other third parties for the purposes of marketing any services except pursuant to customer consent.

To the extent the Company engages in any market campaigns, it has established a supervisory review process to ensure that such campaigns are consistent with the Commission's rules.

The Company maintains a record for at least one year of its own and, if applicable, affiliates' sales and marketing campaigns, if any, that use customers' CPNI.

In the event that the Company changes its marketing practices such that opt-out notices are required, the Company will implement procedures whereby it will provide the Commission written notice within five (5) business days of any instance where the opt-out mechanisms do not work properly, to such a degree that customers' inability to opt-out is more than an anomaly.

The Company did not receive any customer complaints in 2011 concerning the unauthorized release of or access to CPNI. The Company has processes and procedures in place to maintain records of any security breaches and to notify law enforcement and customers of such breaches, consistent with the Commission's rules.

**CUSTOMER PROPRIETARY NETWORK INFORMATION
COMPLIANCE MANUAL**

EXPEREO USA, INC.

The policy of Expereo USA, Inc. ("Expereo" or the "Company") is to comply with the letter and spirit of all laws of the United States, including those pertaining to customer proprietary network information ("CPNI") contained in Section 222 of the Telecommunications Act of 1996, as amended, 47 U.S.C. § 222, and the implementing regulations of the Federal Communications Commission ("FCC"), 47 C.F.R. Part 64, Subpart U. The Company's policy is to protect the confidentiality of CPNI, and to rely on the involvement of high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.

The FCC's regulations, 47 C.F.R. § 64.2009, require the Company to implement a system to clearly establish the status of a customer's CPNI approval prior to the use of CPNI, and to inform its personnel as to when they are, and are not, authorized to use CPNI, and to have an express disciplinary process in place. This Manual constitutes the Company's policies and procedures related to CPNI.

All employees are required to follow the policies and procedures specified in this Manual. Any questions regarding compliance with applicable law and this Manual should be referred to Alphons Mulders. Any violation of, or departure from, the policies and procedures in this Manual shall be reported in writing immediately to Alphons Mulders.

DEFINITION OF CPNI

CPNI is customer specific information that a provider possesses due to its provision of a telecommunications or interconnected voice-over-Internet protocol ("VoIP") service. This information includes, but is not limited to, quality, technical configuration, type, destination, location and amount of use of a telecommunications or interconnected VoIP service subscribed to by a customer that the company would possess solely by virtue of the company-customer relationship. For purposes of voice or interconnected VoIP services, CPNI includes but is not limited to call detail records, call plans, and invoice information. CPNI does not include information that identifies a customer's name, listed telephone number, listed address or primary advertising classification, or any combination thereof. General information based on the calling pattern of a group of subscribers, so long as no one individual subscriber can be determined, is not subject to the specific CPNI obligations.

PROTECTING CPNI

It is the general policy of Expereo not to disclose CPNI, or share it with unaffiliated entities, subject to certain exceptions. Expereo may disclose CPNI if necessary for the provision of service or repair and maintenance; for example, CPNI may be disclosed to vendors for purposes of installation or repair of their network services. Expereo may use, disclose, or permit

access to CPNI to protect the rights of Expereo, or to protect users of its services or other carriers from fraudulent, abusive or unlawful use of their services. CPNI may *not* be shared between Expereo and its affiliates unless such entities provide more than one service to the same customer, but in different categories of service.

If Expereo obtains any CPNI of another telecommunications service provider, it must protect that CPNI and use it only in the provision of the service for which the other provider has contracted Expereo to perform.

Expereo may not use, disclose or permit access to CPNI for the purpose of identifying or tracking customers that call competing service providers.

USE OF CPNI FOR MARKETING PRACTICES

FCC rules provide that CPNI may be used or disclosed without customer consent for purposes of marketing services in the same category of services to which the customer subscribes. The FCC considers this type of marketing arrangement under its "Total Service Approach," which permits a service provider to use a customer's CPNI to market service offerings within or related to a customer's existing service, but restricts carriers from using CPNI to market services outside of the categories of service to which a customer currently subscribes. The FCC rules provide that CPNI may be used or disclosed for purposes of marketing services in a different category of service, only with a customer's express consent. The FCC rules also require retention for a minimum of one year of records of all instances in which Expereo disclosed CPNI to a third party, or permitted a third party to access or use CPNI.

Expereo does not disclose or use CPNI in a manner that would require affirmative customer consent. Under a "Total Service Approach," Expereo may market services within the same category of a customer's subscribed services based on the customer's CPNI without obtaining customer approval. In the event that Expereo decides to use CPNI to, for example, market wireless data services to Internet customer from whom it has not obtained contractual consent, then it will provide notice to customers, seek and document their individual affirmative consent, and implement a system to clearly establish the status of customer consent prior to the use of CPNI. All sales personnel must seek and obtain supervisory review and approval of all outbound marketing campaigns to ensure compliance with the FCC's CPNI rules. Records from this review process must be maintained for at least one year.

Following the Total Service Approach, Expereo may market Internet- and VPN-related services based on the customer's network CPNI without obtaining specific customer approval. As such, Expereo may solicit such customer to subscribe to certain services based on the customer's network configuration, without prior customer approval. In the absence of contractual consent, Expereo must obtain affirmative customer consent in the event that it uses customer CPNI to market services that are in different categories of service than the subscribed services, and will implement a system to establish the status of customer consent prior to the use of CPNI. For example, Expereo would only be permitted to use VPN or MPLS customer-specific CPNI to market non-VPN or non-MPLS services (for example voice service) upon

receiving express consent from the customer, and implementing a system to establish customer consent prior to the use of CPNI. Marketing material for Expereo products and services must be reviewed by Alphons Mulders for CPNI compliance, and must be maintained for at least one year after its distribution. All sales personnel must seek and obtain supervisory review and approval of all outbound marketing campaigns to ensure compliance with the FCC's CPNI rules. Records from this review process must be maintained for at least one year.

ANTI-PRETEXTING SAFEGUARDS

The FCC's rules require service providers to initiate safeguards to protect against pretexting, which is the practice of fraudulently obtaining call detail and other private communications records of another person. Expereo customers may obtain CPNI concerning their accounts only by contacting Alphons Mulders. It is the policy of Expereo not to disclose CPNI to requesting customers unless identifying customer specific account information is provided.

PROCEDURES FOR UNAUTHORIZED DISCLOSURES OF CPNI

It is the policy of Expereo to report any unauthorized disclosure of CPNI, whether intentional or unintentional, to the Company's management.

Pursuant to FCC rules, Expereo will notify the United States Secret Service ("Secret Service") and the Federal Bureau of Investigation ("FBI") of the unauthorized disclosure, as soon as practicable, and in any event no later than seven (7) business days after the unauthorized disclosure. Expereo will not notify the customer or disclose the breach until seven (7) business days after such notification to the Secret Service and the FBI. Expereo will maintain for two years records of all unauthorized disclosures of CPNI and of FBI, Secret Service, and customer notifications.

CPNI COMPLIANCE CERTIFICATIONS

Expereo will file a CPNI compliance report with the FCC annually on or before March 1. Such reports will provide information on Expereo's CPNI practices and information concerning any unauthorized disclosure or use of CPNI. These reports will be filed by Alphons Mulders or another designated officer of the company.

NOTIFICATION AND TRAINING

All Expereo employees with access to CPNI must review this policy manual and affirmatively agree to the policies and restrictions herein. A violation of the CPNI rules by an employee of Expereo will be subject to disciplinary action up to and including termination.